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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda M. Du

**ORDER GRANTING STIPULATION
TO EXTEND TIME TO FILE A
MOTION FOR AN ORDER TO
DISBURSE THE DISTRIBUTION FUND**

**FIRST REQUESTED EXTENSION OF
TIME TO FILE A MOTION FOR AN
ORDER TO DISBURSE**

1 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as
2 follows:

3 1. On May 10, 2024, the Court ordered that Plaintiff United States Securities and
4 Exchange Commission (the “SEC” or “Commission”) shall file a Motion to Approve the
5 Distribution Plan (the “Distribution Plan”) by July 31, 2024, and a Motion for an Order to Disburse
6 the Distribution Fund (the “Motion”) by December 2, 2024. (ECF No. 175). The SEC filed the
7 Motion to Approve the Distribution Plan on July 31, 2024, and the Court approved the Distribution
8 Plan on August 30, 2024 (ECF No. 182).

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10 2. On September 30, 2024, Plan Notice and Certification Forms were mailed to 23
11 Preliminary Claimants. *See Status Report of Rust Consulting, Inc.* (ECF No. 183). To be
12 considered eligible for a distribution payment from the Distribution Fund, a Preliminary Claimant
13 was required to complete and return the Certification Form, along with any supporting
14 documentation, by November 14, 2024. *Id.*

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16 3. Unfortunately, counsel for Plaintiff SEC mistakenly believed the deadline for the
17 Motion for the Order to Disburse was December 13, 2024, one month after the deadline for the
18 Preliminary Claimants to complete and return the Certification Forms. The mistake was discovered
19 this week while preparing the Motion. The SEC respectfully hereby requests an extension of time
20 to Friday, December 13, 2024, to file the Motion.

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22 4. The SEC and counsel for Dean Properties, LLC have agreed to the extension, during
23 which time the SEC will prepare the filing for the Court.

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5. Accordingly, the Parties respectfully request that the time to file the Motion for an Order to Disburse be extended until December 13, 2024.

/s/ Adriene Mixon

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Counsel for Dean Properties, LLC.

IT IS SO ORDERED:



The Honorable Miranda M. Du
United States District Judge

DATED: December 10, 2024